

THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

In re:	§	Chapter 11
KRISJENN RANCH, LLC	§	
<i>Debtor</i>	§	Case No. 20-50805
	§	

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KRISJENN RANCH, LLC and	§	
KRISJENN RANCH, LLC-SERIES	§	
UVALDE RANCH, and KRISJENN	§	
RANCH, LLC-SERIES PIPELINE	§	
ROW as successors in interest to	§	
BLACKDUCK PROPERTIES, LLC,	§	
<i>Plaintiffs</i>	§	
	§	
v.	§	
	§	
DMA PROPERTIES, INC., and	§	
LONGBRANCH ENERGY, LP,	§	Adversary No. 20-05027
<i>Defendants</i>	§	

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DMA PROPERTIES, INC	§	
<i>Cross-Plaintiff/Third Party Plaintiff</i>	§	
v.	§	
KRISJENN RANCH, LLC,	§	
KRISJENN RANCH, LLC-SERIES	§	
UVALDE RANCH, and KRISJENN	§	
RANCH, LLC-SERIES PIPELINE ROW,	§	Adversary No. 20-05027
BLACK DUCK PROPERTIES, LLC,	§	
LARRY WRIGHT, and JOHN TERRILL	§	
Cross-Defendants/Third-Party	§	
<i>Defendants</i>	§	

**KRISJENN RANCH, LLC, KRISJENN RANCH, LLC-SERIES UVALDE RANCH, AND  
KRISJENN RANCH, LLC-SERIES PIPELINE ROW, AS SUCCESSORS IN INTEREST  
TO BLACK DUCK PROPERTIES, LLC'S DESIGNATION OF ITEMS FOR  
APPELLATE RECORD AND STATEMENT OF ISSUES**

TO THE HONORABLE CHIEF BANKRUPTCY JUDGE RONALD B. KING:

COME NOW Debtors, Plaintiffs, and Counter-Defendants KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row (collectively

the “Appellants”) and submit this Designation of Items for Appellate Record pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure and would respectfully request that the Clerk forward the items listed herein to the District Court appeal record.

Appellants reserve the right to supplement.

Appellants designate the items listed below.

<b>Filing Date</b>	<b>Designation #</b>	<b>Docket #</b>	<b>Docket Text</b>
5/1/2020		1	Adversary case 20-05027. Original Complaint Requesting Declaratory Judgment
5/5/2020		3	Amended Complaint
6/1/2020		5	Answer to Complaint
6/1/2020		6	Counterclaim against Krisjenn Ranch, LLC, Krisjenn Ranch, LLC, Series Uvalde Ranch, Krisjenn Ranch, LLC, Series Pipeline Row, Third-Party Complaint against John Terrill, Black Duck Properties, LLC, Larry Wright (Attachments: # 1 Exhibits) (Krist, Austin)
6/12/2020		14	Counterclaim against Krisjenn Ranch, LLC, Krisjenn Ranch, LLC, Series Uvalde Ranch, Krisjenn Ranch, LLC, Series Pipeline Row, Third-Party Complaint against John Terrill, Larry Wright (Krist, Austin)
6/29/2020		20	Answer to Counterclaim
7/6/2020		21	Answer and Affirmative Defenses to Frank Daniel Moore's Counterclaims and Third-Party Claims
8/14/2020		39	Third-Party Defendant Larry Wright's Answer and Affirmative Defenses to Third-Party Plaintiff DMA Properties, INC.'S Third-Party Claims
8/14/2020		40	Third-Party Defendant Larry Wright's Answers and Affirmative Defenses to Frank Daniel Moore's Third-Party Claims
8/14/2020		41	Motion for Partial Summary Judgment on DMA's Ownership Interest in the Bigfoot Note Payments
9/9/2020		60	Answer And Affirmative Defenses To Frank Daniel Moore's Counterclaims And Third-Party Claims

9/9/2020		61	First Amended Answer and Affirmative Defenses To Third Party Plaintiff DMA Properties, Inc.'s Complaint
10/6/2020		89	Response
10/7/2020		90	Supplement To Krisjenn Ranch, LLC Krisjenn Ranch, LLC-Series Uvalde Ranch, And Krisjenn Ranch, LLC Series Pipeline Row, As Successors in Interest To Black Duck Properties, LLC s Response To DMA Properties, Inc.'s Motion For Partial Summary Judgment On DMAs Ownership Interest In The Bigfoot Note Payments
10/12/2020		93	Reply for Third Pty Plaintiffs DMA Properties, Inc., Frank Daniel Moore
10/12/2020		95	Objection
10/21/2020		110	Order regarding (related document(s): 41 Motion for Partial Summary Judgment on DMA's Ownership Interest in the Bigfoot Note Payments
10/28/2020		122	Second Amended Answer and Affirmative Defenses to Third Party Plaintiff DMA Properties, Inc.s Amended Counterclaims and Third Party Complaint
10/28/2020		123	Second Amended Answer and Affirmative Defenses to Frank Daniel Moores Amended Counterclaims and Third-Party Claims
11/2/2020		138	Second Amended Adversary Complaint
11/3/2020		139	Counterclaims and Third Party Claims for Defendant Longbranch Energy, LP
11/3/2020		141	Second Amended Complaint for Plaintiff
11/17/2020		162	Larry Wright's Answer & Affirmative Defenses to Third Party Plaintiff Longbranch Energy, LP's Third-Party Claims
11/18/2020		163	Answer And Affirmative Defenses To Third Party Plaintiff Longbranch Energy, LP's Counterclaims And Third-Party Claims.
11/30/2020		172	Amended Counterclaims and Third-Party Claims for Third Pty Plaintiff DMA Properties, Inc. (Krist, Austin)
11/30/2020		173	Amended Counterclaims and Third-Party Claims for Third Pty Plaintiff Frank Daniel Moore (Krist, Austin)
12/14/2020		186	Debtors' Third Answer to Moore's Amended Counterclaims and Third-Party Complaint

12/14/2020		187	Debtors' Third Answer to DMA Properties, Inc.'s Amended Counterclaims and Third-Party Complaint
12/14/2020		188	3rd Party Defendant Larry Wright's 2nd Amended Answer and Affirmative Defenses to DMA Properties, Inc.'s Amended Third-Party Claims
12/14/2020		189	Third-Party Defendant Larry Wright's 2nd Amended Answer and Affirmative Defenses to Frank Daniel Moore's Amended Third-Party Claims
12/23/2020		197	Answer for Defendant DMA Properties, Inc
12/23/2020		198	Answer for Defendant Longbranch Energy, LP.
1/4/2021		201	Response for Defendants DMA Properties, Inc., Longbranch Energy, LP, Third Pty Plaintiff Frank Daniel Moore.
1/4/2021		205	Proposed Findings of Fact and Conclusions of Law for Third Pty Plaintiffs DMA Properties, Inc., Frank Daniel Moore, Defendant Longbranch Energy, LP
1/6/2021		209	Amended Deposition Designations for Defendants DMA Properties, Inc., Longbranch Energy, LP, Third Pty Plaintiff Frank Daniel Moore
1/8/2021		217	KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Pipeline ROW, KrisJenn Ranch, LLC-Series Uvalde Ranch and Larry Wright's Proposed Findings of Fact and Conclusions of Law
1/15/2021		221	Deposition Designations from Deposition of Adam McLeod for Third Pty Plaintiffs DMA Properties, Inc., Frank Daniel Moore, Defendant Longbranch Energy, LP
1/15/2021		222	Deposition Designations from Deposition of Larry Wright in his capacity as Corporate Representative of KrisJenn Ranch, LLC for Third Pty Plaintiffs DMA Properties, Inc., Frank Daniel Moore, Defendant Longbranch Energy, LP
2/9/2021		226	Transcript regarding Hearing Held 1/12/21
2/9/2021		227	Transcript regarding Hearing Held 1/13/21
2/10/2021		228	Transcript regarding Hearing Held 1/21/21
2/11/2021		229	Transcript regarding Hearing Held 1/15/21
3/24/2021		236	Judge's Opinion

3/24/2021		237	Final Judgment
4/7/2021		240	DMA Properties Motion for Attorneys' Fees and Motion to Amend Judgment
4/21/2021		251	Joint Response in Opposition to Motion for Attorneys' Fees and Motion to Amend Judgment
6/1/2021		258	Transcript regarding Hearing Held 2/11/21
8/6/2021		267	Order Granting in Part, Denying in Part DMA Properties' Motion for Attorneys' Fees and Motion to Amend Judgment□

Appellants hereby identify the following issues:

1. Whether the Bankruptcy Court erred in granting Summary Judgment that: (1) DMA Properties, Inc. has a 50% direct ownership interest in the Bigfoot promissory note payments; (2) Black Duck could not pledge the promissory note; and (3) KrisJenn Ranch were estopped from asserting KrisJenn Ranch had any interest in DMA's portion of the note payments. (Dkts. 41, 110).
2. Whether the Bankruptcy Court erred in granting a Declaratory Judgment in favor of DMA that, under the terms of the Email Agreement and Harris SWD Agreement, DMA has an ownership interest in 50% of the Bigfoot Note payments. (Dkts. 236, 237).
3. Whether the Bankruptcy Court erred in denying Appellants claims against DMA and Longbranch for Tortious interference with the TCRG Purchase Agreement. (Dkt. 236).
4. Whether the Bankruptcy Court erred in granting, in part, DMA's motion for Attorney's Fees. (Dkts. 240, 267).

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record by way of e-service through the CM/ECF system by notice of electronic filing or via email on the 26<sup>th</sup> of August 2021:

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